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USDA NATIONAL  
ORGANIC PROGRAM  
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Re: Written comments, Docket Number TM-0407, Sunset Review, National list of Allowed and Prohibited Substances.

Paragraph 205.601 Synthetic substances allowed for use in organic crop production.

(4) Hydrogen peroxide. Used mainly as a contact fungicide in row crops, very effective. Also sometimes used to eliminate bacteria in fresh vegetable/fruit packing sheds. No known adverse impacts on humans or the environment. Substance is essential for organic crop production, as there are no products with similar qualities. Definitely compatible with organic crop production practices.

(4) Elemental Sulfur. Used in alkaline soils to lower ph and make nutrients available. No compatible other products on the market. There are no known adverse impacts on humans or the environment. Sulfur is compatible with organic crop production practices.

(6) Oils, horticultural – narrow range oils as dormant, suffocating, and summer oils. Used to control soft-bodied insects. There are no known adverse impacts on humans or the environment. These products are compatible with organic crop production practices.

(7) Soaps, insecticidal. Used to control soft-bodied insects such as aphids and mites. There are no known adverse impacts on humans or the environment. Products are compatible with organic crop production practices.

(8) Sticky traps/barriers.

(f) As insect management. Pheromones.

Critical in monitoring various pest affecting row crops, tree fruit and nuts.

Without these tools, producer would have to guess insect infestations, and in

most cases, tremendous crop losses could incur. There are no known adverse impacts on humans or the environment; they are essential for organic production.

- (2) Copper sulfate. In cases of plant nutrition deficiencies, this product is widely used as a foliar spray. Amounts typically do not have any impact on potential accumulations in the soil. There are no known adverse impacts on humans or the environment. In alkaline soils, essential for crop production, as the nutrient ties up easily in the soil, and therefore the roots cannot take the nutrient up.
- (3) Humic Acids – naturally occurring deposits, water and alkali extracts only. Used in a variety of soils as an amendment to increase soil organic matter and biology. Essential for organic production. They have no adverse impact on potential accumulations in the soil. These products are compatible to organic crop production practices.
- (5) Magnesium sulfate – allowed with a documented soil deficiency. Used in alkaline soils to offset the dominance of calcium and to balance soil relationship between calcium and magnesium. Essential for organic production. Does not have any adverse effects on humans or the environment.
- (6) Micronutrients – not to be used as a defoliant, herbicide, or desiccant. Used in all soils as amendment in case of deficiency, also as foliar spray on crops. To provide complete nutrition to the plant, it is necessary to keep these on the allowed list. There are no known adverse effects on humans or the environment. This would also include sub paragraph (i) Soluble boron products and (ii) Sulfates, carbonates, oxides, or silicates of Zinc, copper, iron, manganese, molybdenum, selenium, and cobalt.
- (7) Liquid fish products.... Mainly used as foliar nutrient sprays. Do not have any adverse impact on humans or the environment. The substance is compatible with organic production practices.
- (1) EPA List 4 – Inerts of Minimal Concern. All agricultural nutrient, pest control and fungal control products may have inert ingredients, for better distribution and efficacy of the product. Eliminating inerts List 4 from the list would cause all manufacturers to have to reformulate their products, and it is anticipated that more than 50% of these products would either come off the market or would not be effective, creating high chances of extreme crop losses. There are no known adverse impacts on humans or the environment. These Inerts are essential to organic production.

PLEASE KEEP ALL ABOVE PRODUCTS ON THE NATIONAL LIST.  
ELIMINATION OF ABOVE PRODUCTS COULD HAVE A VERY ADVERSE EFFECT  
ON THE VIABILITY OF THE NATIONAL ORGANIC PROGRAM, AND THE  
PRODUCERS CURRENTLY USING SUCH PRODUCTS.

If I can be of any further assistance or answer additional questions, please do not hesitate to call on me.

Sincerely,

Robert Sandner

Consultant to the environmental and agricultural sciences